

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

RUSTEM KAZAZI; LEJLA KAZAZI; and
ERALD KAZAZI,

Movants,

v.

U.S. CUSTOMS AND BORDER
PROTECTION; UNITED STATES OF
AMERICA; KEVIN McALEENAN,
Commissioner, U.S. Customs and Border
Protection, sued in his official capacity;
TIMOTHY STARK, agent of U.S. Customs
and Border Protection, sued in his individual
capacity; and UNKNOWN AGENTS OF U.S.
CUSTOMS AND BORDER PROTECTION,
sued in their individual capacities

Respondents.

Case No. 1:18-mc-51

Judge Dan Aaron Polster

**Movants' Motion for Admission Pro Hac
Vice of Johanna Talcott**

Pursuant to Local Rule 83.5(h), Movants Rustem Kazazi, Lejla Kazazi, and Erald Kazazi, by and through their undersigned counsel, hereby move this Court for the admission *pro hac vice* of Johanna Beth Talcott, so that she may appear and participate in this case on their behalf.

Ms. Talcott is a member in good standing of the State Bar of California (admitted December 1, 2016, bar number 311491). A Certificate of Good Standing from the Supreme Court of the State of California is attached as **Exhibit 1**.

Ms. Talcott is not now, nor has she ever been disbarred or suspended from practice before any bar, court, department, bureau, or commission of any State of the United States, nor has she ever received any reprimand from any such bar, court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar.

Her contact information is:

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To the extent that good cause is required for admission *pro hac vice*, good cause exists. Ms. Talcott and the Institute for Justice have experience working on civil forfeiture cases, like this case, in which property owners have had relatively small sums of money seized from them. The Institute for Justice is a non-profit, public-interest law firm, which represents all of its clients *pro bono*. The Kazazis believe that they will benefit from the *pro bono* representation of Ms. Talcott and the Institute for Justice, as they work to navigate the complex procedural and substantive issues raised by this case. Of particular benefit to the Kazazis is the Institute for Justice's willingness to provide legal services for free, so that the value of the property at issue is not outstripped by the cost of litigating for its rightful return.

For the foregoing reasons, local counsel for the Kazazis respectfully requests that this Court enter an Order granting the admission *pro hac vice* of Johanna Beth Talcott.

DATED this May 31, 2018.

Respectfully submitted,

/s/ Patrick T. Lewis

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*Attorneys for Movants Rustem Kazazi, Lejla
Kazazi, & Erald Kazazi*

* Motion for admission *pro hac vice*
pending

CERTIFICATE OF SERVICE

I further certify that on this 31st day of May, 2018, I caused a copy of the foregoing Motion and the accompanying exhibit to be served on the Respondents by certified mail, return receipt requested, at the addresses identified below:

U.S. Customs and Border Protection
1300 Pennsylvania Ave. NW
Washington, DC 20229

U.S. Customs and Border Protection
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The Honorable Jefferson Sessions
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